

June 28, 1989

Docket No. 50-423

Mr. Edward J. Mroccka
Senior Vice President
Nuclear Engineering and Operations
Northeast Nuclear Energy Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Mroccka:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. 73075)

The Commission has issued the enclosed Amendment No. 38 to Facility Operating License No. NPF-49 for Millstone Nuclear Power Station, Unit No. 3, in response to your application dated May 9, 1989 as supplemented by your letter dated June 16, 1989.

The amendment modifies the Technical Specifications (TS) as follows: (1) TS Table 3.3-6, "Radiation Monitoring for Plant Operation," is changed to allow containment purge and exhaust isolation area monitors (RE41 and RE42) to be inoperable during performance of the containment integrated leak rate test (ILRT), (2) TS Table 3.3-11, "Fire Detection Instruments" is changed to require that the fire protection instruments in the electrical penetration area (Elevation 24' 6") be operable during the ILRT and (3) TS 3.7.12.2, "Spray and/or Sprinkler Systems" and TS Table 3.7-4, "Fire Hose Stations" is changed to allow the inoperability of the containment cable penetration area sprinkler system and containment fire hose stations during the ILRT.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

/s/

David H. Jaffe, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 38 to NPF-49
2. Safety Evaluation

cc w/enclosures:
See next page

[AMEND TAC 73075]

LA:PDI-4
SNoPis
06/23/89

PM:PDI-4
DJaffe:lm
06/23/89

PD:PDI-4
JStolz
06/23/89

OGC
06/27/89

REGION I
06/28/89

DRD ADRI/A
WRButler
06/28/89

8907050071 890628
PDR ADOCK 05000423
PDC

DF01 1/1

Region I concurs
per 6/28/89 telecon
D. Jaffe / E. McCabe

AMENDMENT NO. 38 TO FACILITY OPERATING LICENSE NO. NPF-49

Docket File

NRC & Local PDRS

Plant File

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D. Jaffe

OGC

D. Hagan (MNBB 3302)

E. Jordan (MNBB 3302)

B. Grimes (9A2)

T. Meek(4) (P1-137)

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J. Calvo

ACRS (10)

GPA/PA

ARM/LFMB

DF01
1/1



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

June 28, 1989

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Senior Vice President
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Sincerely,

A handwritten signature in black ink, appearing to read "D. H. Jaffe", is written over a horizontal line.

David H. Jaffe, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 38 to NPF-49
2. Safety Evaluation

cc w/enclosures:
See next page

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Northeast Nuclear Energy Company

Millstone Nuclear Power Station
Unit No. 3

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

DOCKET NO. 50-423

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 38
License No. NPF-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee) dated May 9, 1989 as supplemented by letter dated June 16, 1989 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

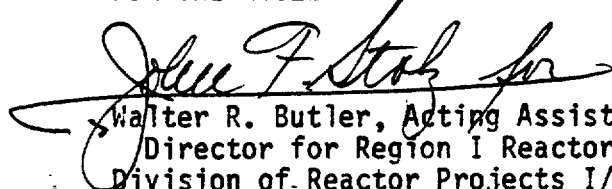
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-49 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 38, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Acting Assistant
Director for Region I Reactors
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 28, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 38

FACILITY OPERATING LICENSE NO. NPF-49

DOCKET NO. 50-423

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. The corresponding overleaf pages are provided to maintain document completeness.

Remove

3/4 3-44

3/4 3-65

3/4 7-33

3/4 7-39

Insert

3/4 3-44

3/4 3-65

3/4 7-33

3/4 7-39

TABLE J.3-6RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATIONS

<u>FUNCTIONAL UNIT</u>	<u>CHANNELS TO TRIP/ALARM</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ALARM/TRIP SETPOINT</u>	<u>ACTION</u>
1. Containment					
a. Containment Area Purge and Exhaust Isolation	1	2	All	≤ 1 R/h	26
b. RCS Leakage Detection					
1) Particulate Radioactivity	N.A.	1	1, 2, 3, 4	N.A.	29
2) Gaseous Radioactivity	N.A.	1	1, 2, 3, 4	N.A.	29
2. Fuel Storage Pool Areas					
a. Criticality-Radiation Level	1	2	*	≤ 15 mR/h	28

TABLE 3.3-6 (Continued)

TABLE NOTATIONS

- * With fuel in the fuel storage pool areas.

ACTION STATEMENTS

- ACTION 26 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the containment purge and exhaust valves are maintained closed. The containment radiation monitoring channels required for containment area purge and exhaust isolation are not required to be OPERABLE during the performance of Type A containment leakage rate tests.
- ACTION 27 - Not used.
- ACTION 28 - With less than the Minimum Channels OPERABLE requirement, operation may continue for up to 30 days provided an appropriate portable continuous monitor with the same Alarm Setpoint is provided in the fuel storage pool area. Restore the inoperable monitors to OPERABLE status within 30 days or suspend all operations involving fuel movement in the fuel storage pool areas.
- ACTION 29 - With the number of OPERABLE Channels less than the Minimum Channels OPERABLE requirement, comply with the ACTION requirements of Specification 3.4.6.1.

TABLE 3.3-11

FIRE DETECTION INSTRUMENTS

INSTRUMENT LOCATION	TOTAL NUMBER OF INSTRUMENTS*		
	HEAT (x/y)	FLAME (x/y)	SMOKE (x/y)
1. <u>Containment**</u>			
a. Elevation 24'6"	8/0		
b. RCP Cubicle D	4/0		
c. RCP Cubicle A	4/0		
d. RCP Cubicle C	4/0		
e. RCP Cubicle B	4/0		
f. Electrical Penetration Area, El. 24'6"			16/0
g. Outer Annulus, El. 3'8" and 24'6"			16/0
2. <u>Auxiliary Building</u>			
a. East MCC Rod Area			0/16
b. West MCC Rod Area			0/16
c. North Floor Area, El. 4'6"			14/0
d. RPCCW Pump Area, El. 24'6"			9/0
e. Charging Pump Area			3/0
f. General Area, El. 43'6"			13/0
g. General Area, El. 66'6"			17/0
h. East MCC Rod Area - CO ₂			0/12
i. West MCC Rod Area - CO ₂			0/12
3. <u>ESF Building</u>			
a. RSS Pump Area			4/0
b. RSS Pump Area			4/0
c. RHR HX Area (North)			8/0
d. RHR HX Area (South)			4/0
e. General Area, El. 4'6"			2/0
f. FWA Pump Area			2/0
g. QSS Pump Area			4/0
h. FWA Pump Area			4/0
i. FWA Pump Area			5/0
j. North HVAC Area			2/0
k. South HVAC Area			2/0
l. H ₂ Recombiner Bldg.			5/0

*(x/y): x is number of Function A (early warning fire detection and notification only) instruments.
y is number of Function B (actuation of Fire Suppression Systems and early warning and notification) instruments.

**The fire detection instruments located within the containment Electrical Penetration Area, El. 24' 6", are required to be OPERABLE during the performance of Type A containment leakage rate tests. All other fire detection instruments located within the containment are not required to be OPERABLE during the performance of Type A containment leakage rate tests.

TABLE 3.3-11 (Continued)

FIRE DETECTION INSTRUMENTS

<u>INSTRUMENT LOCATION</u>	<u>TOTAL NUMBER OF INSTRUMENTS*</u>		
	<u>HEAT</u> (x/y)	<u>FLAME</u> (x/y)	<u>SMOKE</u> (x/y)
4. <u>Control Building</u>			
a. Switchgear Room A			0/19
b. Cable Tray A, El. 4'6"			0/19
c. Battery Room A			8/0
d. Switchgear Room B			0/20
e. Cable Tray B, El. 4'6"			0/17
f. Battery Room B			6/0
g. NE Cable Spreading Room			0/8
h. SE Cable Spreading Room			0/11
i. NW Cable Spreading Room			0/8
j. SW Cable Spreading Room			0/11
k. Computer Room Floor			2/0
l. East Instrument Rack Room Floor			3/0
m. West Instrument Rack Room Floor			5/0
n. Computer Room	0/4		4/0
o. East Instrument Rack Room			7/0
p. West Instrument Rack Room	0/17		12/0
q. Control Room	1/0		27/0
r. HVAC Room			9/0
s. Chiller Room			3/0
t. Switchgear Room A - CO ₂			0/16
u. Switchgear Room B - CO ₂			0/15
v. Cable Spreading Room - CO ₂			0/15
w. Cable Spreading Room - CO ₂			0/19
5. <u>Emergency Diesel Building</u>			
a. Diesel Generator A Area	14/0	4/0	1/0
b. Diesel Generator B Area	14/0	4/0	1/0
c. Fuel Oil Tank Vault A	0/3		2/0
d. Fuel Oil Tank Vault B	0/3		2/0
6. <u>Intake Structure</u>			
a. Circ. Water Pump Area			6/0
b. Service Water Pump Area A			4/0
c. Service Water Pump Area B			4/0
7. <u>Service Building</u>			
a. North Cable Tunnel			0/6
b. South Cable Tunnel			0/7
c. North Cable Tunnel - CO ₂			0/5
d. South Cable Tunnel - CO ₂			0/6

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.12.2 The following Deluge Spray and/or Sprinkler Systems shall be OPERABLE:

- a. A Emergency Generator Enclosure Sprinkler,
- b. B Emergency Generator Enclosure Sprinkler,
- c. A RSST Deluge,
- d. B RSST Deluge,
- e. A Fuel Building Filter Bank Deluge,
- f. B Fuel Building Filter Bank Deluge,
- g. A Auxiliary Building Filter Bank Deluge,
- h. B Auxiliary Building Filter Bank Deluge,
- i. A Supplementary Leak Collection Filter Bank Deluge,
- j. B Supplementary Leak Collection Filter Bank Deluge,
- k. Containment Cable Penetration Area Sprinkler,*
- l. Charging Pump Water Curtain Sprinkler System, and
- m. ESF Building Water Curtain Sprinkler System.

APPLICABILITY: Whenever equipment protected by the Deluge Spray/Sprinkler System is required to be OPERABLE.

ACTION:

- a. With one or more of the above required Deluge Spray and/or Sprinkler Systems inoperable, within 1 hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

*The Containment Cable Penetration Area Sprinkler is not required to be OPERABLE during the performance of Type A containment leakage rate tests.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.7.12.2 Each of the above required Deluge Spray and/or Sprinkler Systems shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) outside containment in the flow path is in its correct position,
- b. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel,
- c. At least once per 18 months by verifying that each valve (manual, power-operated, or automatic) inside containment in the flow path is in its correct position,
- d. At least once per 18 months:
 - 1) By performing a system functional test which includes simulated automatic actuation of the system, and:
 - a) Verifying that the deluge valves in the flow path actuate to their correct positions on a simulated test signal, and
 - b) Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel.
 - 2) By a visual inspection of the dry pipe deluge and sprinkler headers to verify their integrity; and
 - 3) By a visual inspection of each nozzle's spray area to verify the spray pattern is not obstructed.*
- e. At least once per 3 years by performing an air flow or water test through each open head deluge header and verifying each open head deluge nozzle is unobstructed.*

*Not applicable to the Fuel Building, Auxiliary Building, or Supplementary Leak Collection Filter Banks.

TABLE 3.7-4
FIRE HOSE STATIONS

<u>LOCATION*</u>	<u>ELEVATION</u>	<u>HOSE RACK NUMBER</u>	
Containment**	-24'6"	86,	90
Containment**	3'8"	85,	89
Containment**	24'6"	84,	88, 105
Containment**	51'4"	83,	87
Auxiliary Building	4'6"	45	- 49
Auxiliary Building	24'6"	50	- 53
Auxiliary Building	43'6"	54	- 57
Auxiliary Building	66'6"	58	- 62
A Diesel Generator Enclosure	24'6"	78	
B Diesel Generator Enclosure	24'6"	79	
Fuel Building	11'0"	65	
Fuel Building	24'6"	66	- 68
Fuel Building	52'4"	94	

**The fire hose stations located within the containment are not required to be OPERABLE during the performance of Type A containment leakage rate tests.

PLANT SYSTEMS

YARD FIRE HYDRANTS AND HYDRANT HOSE HOUSES

LIMITING CONDITION FOR OPERATION

3.7.12.6 The yard fire hydrants and associated hydrant hose houses given in Table 3.7-5 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the yard fire hydrants is required to be OPERABLE.

ACTION:

- a. With one or more of the yard fire hydrants or associated hydrant hose houses given in Table 3.7-5 inoperable, within 1 hour have sufficient additional lengths of 2 1/2 inch diameter hose located in an adjacent OPERABLE hydrant hose house to provide service to the unprotected area(s) if the inoperable fire hydrant or associated hydrant hose house is the primary means of fire suppression; otherwise, provide the additional hose within 24 hours.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.12.6 Each of the yard fire hydrants and associated hydrant hose houses given in Table 3.7-5 shall be demonstrated OPERABLE:

- a. At least once per 31 days, by visual inspection of the hydrant hose house to assure all required equipment is at the hose house,
- b. At least once per 6 months (once during March, April, or May and once during September, October, or November), by visually inspecting each yard fire hydrant and verifying that the hydrant barrel is dry and that the hydrant is not damaged, and
- c. At least once per 12 months by:
 - 1) Conducting a hose hydrostatic test at a pressure of 150 psig or at least 50 psig above maximum fire main operating pressure, whichever is greater,
 - 2) Inspecting all the gaskets and replacing any degraded gaskets in the couplings, and
 - 3) Performing a flow check of each hydrant to verify its OPERABILITY.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 38

TO FACILITY OPERATING LICENSE NO. NPF-49

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

DOCKET NO. 50-423

1.0 INTRODUCTION

By application for license amendment dated May 9, 1989, as supplemented by letter dated June 16, 1989, Northeast Nuclear Energy Company, et al. (the licensee), requested changes to Millstone Unit 3 Technical Specifications (TS) as follows: (1) TS Table 3.3-6, "Radiation Monitoring for Plant Operation," would be changed to allow containment purge and exhaust isolation area monitors (RE41 and RE42) to be inoperable during performance of the containment integrated leak rate test (ILRT), (2) TS Table 3.3-11, "Fire Detection Instruments" in the electrical penetration area (Elevation 24' 6") be operable during the ILRT and (3) TS 3.7.12.2, "Spray and/or Sprinkler Systems" and TS Table 3.7-4, "Fire Hose Stations" would be changed to allow the inoperability of the containment cable penetration area sprinkler system and containment fire hose stations during the ILRT.

2.0 DISCUSSION

Millstone Unit 3 TS 4.6.1.2 and Appendix J to 10 CFR Part 50 requires that Northeast Nuclear Energy Company perform a Type A, ILRT, for the primary containment at the specified test interval. While preparing to perform the ILRT during the Cycle 2/Cycle 3 refueling outage, the licensee identified two areas where incompatibility exists between the requirements to perform the ILRT and other TS requirements to maintain certain components and systems operable during the ILRT. The following areas of inconsistency were identified by the licensee:

1. Radiation Monitoring - TS Table 3.3-6, Item 1a, requires that the containment area purge and exhaust isolation radiation monitors be maintained operable (in all modes). If the subject monitors become inoperable, the containment exhaust and purge valves must be maintained in the closed position per Action Statement 26.

The licensee has proposed that ACTION Statement 26 be revised to remove the requirements that the containment purge and exhaust isolation area radiation monitors (RE41 and RE42) be operable during the Type A containment ILRT.

During a Type A containment ILRT, the Millstone Unit No. 3 containment is pressurized to the calculated design basis accident containment pressure of 54.1 psia to verify containment leak tightness. The pressurization path is through the purge air supply piping, Containment Penetration Z86. The containment purge and exhaust system is interlocked with radiation monitoring instrumentation located inside containment. Since the radiation monitoring instrumentation is not designed to withstand a pressure of 54.1 psia, they will be removed from containment for the duration of the ILRT. Per Technical Specification 3.3.3.1, which references TS Table 3.3-6, the purge and exhaust valves must be isolated with less than minimum radiation monitoring instrumentation channels available. However, opening the purge air supply valve is required to conduct the ILRT and satisfy 10 CFR Part 50, Appendix J. Therefore, a revision to ACTION Statement 26 has been proposed to remove the requirement that the RE41 and RE42 radiation monitors be operable during the containment ILRT.

2. Fire Protection - TS 3.7.12.2, Item K and TS Table 3.7-4 requires the containment cable penetration area sprinkler system and the containment fire hose stations, to be operable, respectively. The licensee has indicated that the containment fire protection water system that enters containment at Penetration Z56 must be drained and vented to meet the provisions of the Millstone Unit No. 3 Final Safety Analysis Report (FSAR) Section 6.2.6 and the requirements of 10 CFR Part 50, Appendix J for performance of the ILRT.

Accordingly, the licensee has proposed that a footnote be added to Technical Specification Section 3.7.12.2 and TS Table 3.7-4 which exempts the containment cable penetration area sprinkler system and containment fire hose stations from operability requirements during Type A containment ILRT. To partially mitigate the proposed inoperability of the containment fire suppression systems, the licensee has proposed a footnote to Table 3.3-11 to add a requirement that fire detection instruments in the electrical penetration area, Elevation 24'6", be operable during the performance of Type A containment ILRT. All other fire detection instruments located within the containment area would not be required to be operable during the performance of a Type A containment ILRT. At the present time, TS Table 3.3-11 does not require the operability of any fire protection instrumentation, inside containment, during the ILRT.

3.0 EVALUATION

With regard to the proposed changes to the TS, the licensee has proposed suitable compensatory measures to allow radiation monitors RE41 and RE42, and the identified fire suppression equipment to be inoperable during the ILRT as follows:

- ° For the radiation monitors, the compensatory measure is to obtain and analyze periodic "grab samples" to assure that no radioactive releases are in progress. In the event of a radioactive release, inside containment, the purge and exhaust lines could be manually closed.
- ° For the fire suppression equipment, the compensatory measure is to require the operability of other fire detection instruments in the electrical penetration area. In the event of a fire, the fire water system could be unisolated.

The above remedial actions are judged to be adequate to allow the inoperability of subject equipment without any significant increase in risk.

Moreover, since the duration of the ILRT is fairly short, approximately 48 hours, the overall risk is relatively low. Accordingly, the proposed changes to the TS are acceptable.

4.0 EMERGENCY CIRCUMSTANCES

The licensee's June 16, 1989 presents the following with regard to justification of the need for emergency consideration of the May 9, 1989 application:

"Presently, Millstone Unit No. 3 is in Mode 5 since the plant was shut down for a refueling outage on May 11, 1989. Emergency authorization is required to permit timely resumption of operation (i.e., criticality) which is currently scheduled for July 3, 1989. Prior to the resumption of operation, a Type A containment ILRT is required to be performed during this outage, and is presently scheduled to commence on June 27, 1989. To support this schedule, the subject amendment would need to be issued prior to the start of the ILRT. As stated above, the upcoming containment ILRT will be conducted for the first time since Millstone Unit No. 3 received its full-power operating license in January 1986. Only recently, during the final preparation for the subject test, NNECO identified Technical Specification changes, described in the May 9, 1989 application, that are required in order to carry out the containment ILRT. Following a consultation with NRC staff, NNECO expeditiously processed a proposed change to the Millstone Unit No. 3 Technical Specifications to support the containment ILRT and submitted a license amendment request to the NRC staff by letter dated May 9, 1989. NNECO made every effort to have this license amendment request processed under normal circumstances. In addition, according to the Federal Register Notice dated May 31, 1989 (54 FR 23317), the 30-day time limit for the comment period on this license amendment request expires on June 30, 1989."

We conclude that failure to grant the emergency license amendment would delay resumption of operation of Millstone Unit 3.

Based upon the above, we conclude that the licensee has adequately addressed the standards of 10 CFR 50.91(a)(5) with regard to demonstrating the need for an emergency license amendment. We further conclude that the licensee has not abused the emergency provision by failing to make timely application for the amendment.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations, if operation of the facility, in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

This amendment has been evaluated against the standards in 10 CFR 50.92. It does not involve a significant hazards consideration because the changes would not:

1. Involve a significant increase in the probability or consequences of any accident previously analyzed.

The Type A ILRT is performed in Mode 5 with no personnel in containment. There are no design basis accidents which occur in Mode 5 and rely on either containment purge and exhaust radiation monitoring or the inside containment fire detection/suppression equipment. The only accidents which can occur in Mode 5 and require these functions are a loss of shutdown cooling and an inside containment fire.

Sufficient time exists following a loss of shutdown cooling for the operator to manually isolate the valves and prevent any releases from containment. Operator action is based on indications of a loss of shutdown cooling event. Thus, the change does not impact the consequences of a loss of shutdown cooling event.

During depressurization of the containment, grab samples will be obtained to verify that a radioactivity release is not occurring. Thus, it will limit the potential radiological consequences of the ILRT to an acceptable level.

The fire detection and suppression equipment is credited only in fire scenarios. The changes will permit the containment fire water isolation valves to be closed in order to measure containment leakage, but will require the fire detection instrumentation in the electrical penetration area to be operable. The operating fire detection components ensure that the operators will be alerted to a fire inside containment. As stated above, the plant procedure governing the Type A containment ILRT will require the cancellation of the ILRT and the opening of containment water isolation valves if both a smoke detection alarm is received and if any energized component/system operating within the containment trips simultaneously for any unknown reason during the test. Action statements within the containment leakage rate test procedure will allow the plant to take appropriate actions (open fire isolation valves) before any major fire damage occurs. Thus, the change does not impact the consequences of a postulated inside containment fire.

The containment purge and exhaust radiation monitoring equipment and containment fire detection/suppression system do not have the potential to initiate any previously analyzed accident. Operator action to isolate the purge and exhaust system or unisolate the containment fire water system, based on available indication, will negate the impact on the consequences of having these systems inoperable. For these reasons, the changes to the operability requirements of these systems do not increase the probability or consequence of any previously analyzed accident.

2. Create the possibility of a new or different kind of accident from any previously analyzed. The changes do not alter the way the plant is operated and only affects the containment ILRT. The change does not introduce new failure modes. For these reasons, the change does not have the potential to create a new type of accident from that previously analyzed.
3. Involve a significant reduction in a margin of safety. The changes do not impact any of the protective boundaries. The plant operators will be able to either isolate the containment purge and exhaust system or unisolate the containment fire water system (during the ILRT) based on available instrumentation. Thus, these safety functions will not be impacted by the change. The change does not increase the consequences of any design basis event. For these reasons, the change does not reduce the margin of safety.

Accordingly, the Commission has determined that the application for amendment, dated May 9, 1989, as supplemented by letter dated June 16, 1989, involves no significant hazards consideration.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, efforts were made to contact the Connecticut State representatives. The state representative was contacted and had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. We have determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The staff has previously published a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 28, 1989

Principal Contributor: D. H. Jaffe